



# City of Westminster

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CRWQCB - REGION 8	
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January 26, 2009

California Regional Water Quality Control Board, Santa Ana Region  
Attn: Gerard Thibeault, Executive Officer  
3737 Main Street, Suite 500  
Riverside, CA. 92501


Re. Tentative Order No. R8-2008-0030 NPDES No. CAS 618030

Dear Mr. Thibault:

City of Westminster welcomes the chance to provide comments to the Regional Water Quality Control Board's Tentative Order No. R8-2008-0030, dated November 10, 2008.

In general, the City is mostly concerned with the increase in administrative burden. The draft permit is imposing many new requirements upon the permittees when we are in a time of economic hardship. At a time where there is a budget restriction and hiring freeze, it is difficult for permittees to meet some of the new demands listed in the draft permit that requires more frequent inspections or report submissions.

The City of Westminster is in support of the comments prepared by the County of Orange in regards to the subject matter. In addition, we have the following specific concerns in regards to the draft permit:

Section III.3 – The proposed language implies that permitted categories of discharges are assumed to be in violation until permittees have determined them to be in compliance, while the current permit assumed the discharges to be in compliance until permittees have determined them to be in violation. City believes that the tone of the current permit should be kept.

Section X.2 – Ranking for commercial sites should be risk based instead of a mandatory curve based (10% high 40% med.)

Section X.3 – For commercial inspection, photographic documentations should only be required in cases of violations similar to that of the industrial inspection (section IX.3).

Section IX.6 & X.5 – Please clarify if the Board is asking for the submittal of only an inventory list with the annual report or the actual electronic database with all inspection data and pictures.

Section XII.B.3 – Please provide a better definition or examples of Effective Impervious Area.

We appreciate the opportunity to bring our comments and concerns to the Regional Board for consideration. If you have any questions, please call me at (714) 898-3311, ext. 446.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel Hsieh", with a stylized flourish at the end.

Daniel Hsieh,  
Associate Civil Engineer